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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In Re:

LEHMAN BROTHERS HOLDINGS, INC.,
et al.,

Debtors.

Chapter 11

Case No. 08-13555 (SCC)

(Jointly Administered)

**DECLARATION OF PAUL J. LAWRENCE IN SUPPORT OF WASHINGTON STATE
TOBACCO SETTLEMENT AUTHORITY'S OPPOSITION TO LEHMAN'S MOTION
TO EXCLUDE DANIEL CURRY AND JEFFREY HASTEROK**

I, Paul J. Lawrence, declare as follows:

1. I am a partner at Pacifica Law Group LLP, counsel of record for the Washington State Tobacco Settlement Authority ("TSA"), in the above-captioned matter. I am over the age of 18, am competent to testify, and offer this declaration based on my personal knowledge.

DECLARATION OF PAUL J. LAWRENCE IN
SUPPORT OF WASHINGTON STATE TOBACCO
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LEHMAN'S MOTION TO EXCLUDE DANIEL
CURRY AND JEFFREY HASTEROK - 1

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the deposition of Michael Kim Herman as a 30(b)(6) witness on behalf of TSA taken in this litigation on December 16, 2013.

3. Attached hereto as **Exhibit 2** is a true and correct copy of the October 1, 2002 Indenture by and between TSA and U.S. Bank, N.A. as Indenture Trustee.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a March 24, 2009 email from Dennis Tupper of Deutsche Bank to Sergey Arefiev of Lehman Brothers regarding Washington State Tobacco, produced by Lehman Brothers in discovery in this matter at LBHI_WTSA_00000331.

5. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts from the deposition of Samuel M. Gruer, taken in this litigation on March 6, 2014.

6. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts from the deposition of David F. Babbel, taken in this litigation on March 7, 2014.

7. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts from the deposition of Dean Melchior as a 30(b)(6) witness on behalf of Lehman Brothers taken in this litigation on December 11, 2013.

8. Attached hereto as **Exhibit 7** is a true and correct copy of the March 24, 2014 Rebuttal Report by Peter Shapiro, produced by TSA in this litigation.

9. Attached hereto as **Exhibit 8** is a true and correct copy of Peter Orr, *50 Years of UST Yields – How Well do Forwards Predict?*, WWW.INTUITIVE-ANALYTICS.COM (May 17, 2013),

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available at <http://www.intuitive-analytics.com/blog/bid/59605/50-Years-of-UST-Yields-How-Well-do-Forwards-Predicts> (last visited October 10, 2014).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Seattle, Washington this 14th day of October, 2014.

By /s/ Paul J. Lawrence
Paul J. Lawrence, WSBA # 13557
Admitted Pro Hac Vice
Attorney for Washington State Tobacco
Settlement Authority

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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of October, 2014, I caused the document to which
this Certificate is attached to be served upon the following:

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- ☐ via facsimile
- ☐ via overnight courier
- ☐ via first-class U.S. mail
- ☐ via email
- ☒ via electronic court filing
- ☐ via hand delivery

Attorneys for the Debtors and Debtors in
Possession

Signed at Seattle, Washington this 14th day of October, 2014.

/s/ Kymberly K. Evanson
Kymberly K. Evanson
Attorney for Washington State Tobacco
Settlement Authority

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